

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

MICHAEL MORANA, Individually and On Behalf
Of All Other Persons Similarly Situated,

Plaintiff,

v.

PARK HOTELS & RESORTS, INC. d/b/a HILTON
WORLDWIDE HOLDINGS, INC., HLT NY
WALDORF LLC, HILTON DOMESTIC
OPERATING CO. INC., and
WALDORF=ASTORIA MANAGEMENT LLC,

Defendants.

Case No. 1:20-cv-02797-RA

SUPPLEMENTAL DECLARATION OF OWEN WILCOX

OWEN WILCOX hereby declares as follows:

1. I am currently employed by Hilton Employer Inc., a wholly owned subsidiary of Hilton Worldwide Holdings Inc.,¹ as its Senior Vice President and Assistant General Counsel. This supplemental declaration (the “Supplemental Declaration”) is submitted in further support of Defendants Park Hotels & Resorts Inc. (f/k/a Hilton Worldwide, Inc.), Hilton Worldwide Holdings Inc., HLT NY Waldorf LLC, Hilton Domestic Operating Company Inc., and Waldorf=Astoria Management LLC’s (together the “Defendants”) motion to dismiss the First Amended Complaint of Plaintiff Michael Morana (“Plaintiff”) in the above-referenced action, or in the alternative, to compel Plaintiff’s claims to arbitration (the “Motion”). The Supplemental Declaration fully incorporates

¹ The caption of Plaintiff’s First Amended Complaint misstates the proper name of “Hilton Worldwide Holdings Inc.,” as well as “Park Hotels & Resorts Inc.” Further, Plaintiff alleges that Defendant Park Hotels & Resorts Inc. is doing business as Hilton Worldwide Holdings Inc. This is not correct.

my first declaration submitted in support of Defendants' Motion on July 13, 2020. (ECF No. 35.) Unless noted otherwise, all of the foregoing is based on personal knowledge I obtained from a review of Defendants' relevant business records.

2. Between 2014 and until the Waldorf Astoria New York (the "Waldorf Astoria") closed in March 2017, the Waldorf Astoria was an active member of the Hotel Association of New York City, Inc. (the "Hotel Association"), a national professional trade association.

3. As an active member, the Waldorf Astoria gave the Hotel Association authority to enter into labor contacts on its behalf, including the Collective Bargaining Agreement (the "CBA"), dated July 1, 2012, between itself and the New York Hotel and Motel Trades Counsel, AFL-CIO. Thus, at all relevant times, the Waldorf Astoria was party to the CBA.

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I declare under penalty of perjury under the laws of the State of New York and the United States that the foregoing is true and correct.

Signature: 

Printed Name: OWEN WILCOX

Title: Senior Vice President + Assistant
General Counsel

Date: August 10, 2020